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Attorneys for Defendants CITY OF GARDEN GROVE, a public entity and OFFICER J. WAINWRIGHT; OFFICER A. COUGHRAN; OFFICER T. ASHBAUGH; OFFICER R. LOERA; and OFFICER MARCHAND, as employees of Defendant City of Garden Grove, a public entity

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

ABDELNASER ELMANSOURY,

Plaintiff,

V.

CITY OF GARDEN GROVE; J. WAINWRIGHT, individually and as Supervisor for the Garden Grove Police Department; A. COUGHRAN, individually and as Police Officer for the Garden Grove Police Department; T. ASHBAUGH, individually and as Police Officer for the Garden Grove Police Department; R. LOERA, individually and as Police Officer for the Garden Grove Police Department; MARCHAND, individually and as Police Officer for the Garden Grove Police Department; and DOES 1 through 50,

Defendants.

CASE NO: 8:17-cv-01269 DOC (DFMx)
BEFORE THE HONORABLE
DAVID O. CARTER
COURTROOM 9D

**[DISCOVERY DOCUMENT:
REFERRED TO MAGISTRATE
JUDGE DOUGLAS F.
MCCORMICK]**

**[REPROPOSED] PROTECTIVE
ORDER RE PERSONNEL
RECORDS**

HEARING DATES PENDING:

Type: Final Pretrial Conference
Date: May 28, 2019
Time: 8:30 a.m.
Courtroom: 9D

Type: Trial
Date: June 11, 2019
Time: 8:30 a.m.
Courtroom: 9D

GOOD CAUSE APPEARING, and in accordance with the parties' Stipulation
re Protective Order re Personnel Records, IT IS HEREBY ORDERED that
Defendants CITY OF GARDEN GROVE, a public entity, and OFFICER J.
WAINWRIGHT; OFFICER A. COUGHRAN; OFFICER T. ASHBAUGH; OFFICER

1 R. LOERA; and OFFICER MARCHAND, as employees of Defendant City of Garden
2 Grove, a public entity, and Plaintiff ABDELNASER ELMANSOURY, by and
3 through his respective counsel, are to abide by the Stipulation and this Protective
4 Order regarding the Protected Material as indicated in the Stipulation re Protective
5 Order re Personnel Records concurrently filed herewith.

6
7 DATED: 05/07/2019


HONORABLE DOUGLAS F. MCCORMICK
UNITED STATES MAGISTRATE JUDGE

PROOF OF SERVICE
STATE OF CALIFORNIA, COUNTY OF ORANGE

I am over the age of 18 and not a party to the within action; I am employed by WOODRUFF, SPRADLIN & SMART in the County of Orange at 555 Anton Boulevard, Suite 1200, Costa Mesa, CA 92626-7670.

On May 2, 2019, I served the foregoing document(s) described as
[PROPOSED] PROTECTIVE ORDER RE PERSONNEL RECORDS

- by placing the true copies thereof enclosed in sealed envelopes addressed as stated on the attached mailing list;
 - (BY MAIL)** I placed said envelope(s) for collection and mailing, following ordinary business practices, at the business offices of WOODRUFF, SPRADLIN & SMART, and addressed as shown on the attached service list, for deposit in the United States Postal Service. I am readily familiar with the practice of WOODRUFF, SPRADLIN & SMART for collection and processing correspondence for mailing with the United States Postal Service, and said envelope(s) will be deposited with the United States Postal Service on said date in the ordinary course of business.
 - (BY ELECTRONIC SERVICE)** by causing the foregoing document(s) to be electronically filed using the Court's Electronic Filing System which constitutes service of the filed document(s) on the individual(s) listed on the attached mailing list.
 - (BY OVERNIGHT DELIVERY)** I placed said documents in envelope(s) for collection following ordinary business practices, at the business offices of WOODRUFF, SPRADLIN & SMART, and addressed as shown on the attached service list, for collection and delivery to a courier authorized by to receive said documents, with delivery fees provided for. I am readily familiar with the practices of WOODRUFF, SPRADLIN & SMART for overnight delivery, and said collection and processing of documents for envelope(s) will be deposited for receipt by on said date in the ordinary course of business.
 - (BY FACSIMILE)** I caused the above-referenced document to be transmitted to the interested parties via facsimile transmission to the fax number(s) as stated on the attached service list.
 - (BY PERSONAL SERVICE)** I delivered such envelope(s) by hand to the offices of the addressee(s).
 - (Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made. I declare under penalty of perjury that the above is true and correct.

Executed on May 2, 2019, at Costa Mesa, California.

s/ *Laura F. Perez*
LAURA F. PEREZ

1 **ABDELNASER ELMANSOURY v. CITY OF GARDEN GROVE, et al.**

2 **ASSIGNED FOR ALL PURPOSES TO**
3 **HONORABLE DAVID O. CARTER**
4 **COURTROOM 9D**
5 **MAGISTRATE JUDGE DOUGLAS F. MCCORMICK**
6 **COURTROOM 6B**

7 **USDC, CENTRAL DISTRICT OF CALIFORNIA**
8 **CASE NO. 8:17-cv-1269 DOC (DFMx)**

9 **SERVICE LIST**

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32 03/01/18